



Rep. Julie M. Rogers
Chair
House Health Policy Committee
124 North Capitol Avenue
Lansing, MI 48933

By Email: JulieRogers@house.mi.gov

Re: Support for SB219/HB4316

Dear Chairwoman Rogers,

Members of the American Disease Prevention Coalition (ADPC) write to support SB219 and HB4316. ADPC is a coalition composed of leading health associations, pharmacists, and vaccine innovators who advocate for laws and policies that enable pharmacists', pharmacy technicians', and pharmacy interns to deliver essential vaccine services to the American public.

ADPC supports provisions in this legislation that would make the Pharmacy Practice Act consistent with federal guidance under the PREP Act Declaration as well as current practice for enhanced access to vaccines. Importantly, this legislation would allow pharmacists and trained pharmacy technicians to continue administering any immunizations recommended by the Centers for Disease Control and Prevention/Advisory Committee on Immunization Practices (CDC/ACIP) or emergency use vaccines authorized or approved by the Food and Drug Administration (FDA).

Vaccination is an essential part of maintaining health and well-being by reducing the risk of illness, disability, and death due to vaccine-preventable diseases. Vaccines help prevent serious diseases, including COVID-19, influenza (flu), pneumonia, tetanus, pertussis (whooping cough), herpes zoster (shingles), meningitis, and hepatitis A and B. Unfortunately, in Michigan rates for recommended vaccinations are below where they were in 2019 (pre-pandemic).¹ Pharmacist administered vaccines can improve access and convenience, especially in low-income and rural communities.^{2, 3} In 2021, 80% of Michiganders got their vaccines at a pharmacy⁴. With new vaccines on the horizon, pharmacists, pharmacy interns, and pharmacy technicians are uniquely positioned to connect more patients to this care.

¹ Vaccine Track, <https://www.vaccinetrack.com/?state=26>

² <https://ghlf.org/ghlf-news/global-healthy-living-foundation-study-finds-that-empowering-pharmacists-to-more-widely-immunize-can-increase-vaccine-access-reduce-health-disparities-in-low-income-communities/>

³ <https://pubmed.ncbi.nlm.nih.gov/24019274/>

⁴ IQVIA LRx and DX, August 2022 (as per data in IQVIA Institute, "Trends in Vaccine Administration in the United States")

Pharmacists play an essential role in preventing and treating disease, especially given their rigorous professional education and training around medications and vaccines, vaccine practice management, adverse reactions to vaccines, vaccine guidance and recommendations, as well as possessing a skill set for administering vaccines and medication.⁵ As part of their work, they also enhance awareness of vaccines by assessing a patient's immunization status, recommending vaccines, administering vaccines, and reporting vaccinations to maintain coordination with all immunizing providers. Supported by pharmacy interns and pharmacy technicians who are well trained in administering vaccines, the public has come to rely on trusted pharmacists and other pharmacy vaccinators for this service.

Recognizing that pharmacies are a critical access point delivering care to the broader population, the U.S. Department of Health and Human Services (HHS) took action in the early days of the Covid-19 pandemic to make sure that people across the country could access a broad portfolio of vaccine services at their local pharmacy. In doing so, HHS temporarily authorized pharmacists to initiate, order, and administer COVID-19 vaccines for individuals 3 years and older and all ACIP-recommended vaccines for individuals 3-18 years old, and authorized pharmacy interns and pharmacy technicians to assist pharmacists in administering those vaccines as well as the seasonal flu vaccine.⁶ Making these allowances permanent will simplify access to pharmacy vaccine services for Michiganders, supporting their ability to get vaccinated against life-threatening diseases.

We thank the House Health Policy Committee for your consideration and urge the swift adoption of these policies to ensure that the citizens of Michigan continue to have adequate access and choice to all approved and recommended vaccinations. Doing so will increase immunization rates, reduce overall health care costs, and save lives.

Sincerely,

American Disease Prevention Coalition
<https://www.vaccinesshouldntwait.org/>

cc.

The Honorable Joe Tate, Speaker of the House, joetate@house.mi.gov

The Honorable Abraham Aiyash, Majority Floor Leader, abrahamaiyash@house.mi.gov

⁵ <https://vaccinesshouldntwait.org/wp-content/uploads/2022/03/ADPC-Backgrounder-Brochure-030122.pdf>

⁶ <https://www.govinfo.gov/content/pkg/FR-2021-03-16/pdf/2021-05401.pdf>